

CTJRM/T

ORIGINAL

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
MAY 13 2009
CLERK, U.S. DISTRICT COURT
By Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ISAAC McCRUMBY (1)
KIMBERLY CRAWFORD (2)

§
§
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§
§
§
§

No. **4-09CR-060-A**

INDICTMENT

The Grand Jury Charges:

Introduction

1. Background:
 - a. Defendant **Kimberly Crawford** was employed as a customer service representative at Countrywide Bank.
 - b. Countrywide Bank was, at all relevant times, a financial institution as defined by 18 U.S.C. §20 in that it was at all relevant times insured by the Federal Deposit Insurance Corporation.
 - c. Countrywide Bank was eventually purchased by Bank of America, also a financial institution as defined by 18 U.S.C. §20 in that it was at all relevant times insured by the Federal Deposit Insurance Corporation.
 - d. Countrywide Bank and Bank of America were at all relevant times

organizations doing business in interstate commerce.

- e. **Crawford's** job as a customer service specialist gave her access to customer's bank account numbers.

2. The Scheme and Artifice to Defraud:

- a. During the course of her employment, **Crawford** answered telephone calls from customers who had questions about their accounts. When the customers gave her their account numbers, **Crawford** wrote the account numbers down on a piece of paper.
- b. After **Crawford** had gathered 30 to 40 account numbers, she would call defendant **Isaac McCrumby**, and the two would arrange a meeting. **Crawford** would typically meet **McCrumby** at his office/music studio, where she would sell him the list of account numbers she had created.
- c. **McCrumby** used the account numbers to create and pass counterfeit checks. **McCrumby** printed the counterfeit checks at his office, and personally passed approximately 500 counterfeit checks. **McCrumby** averaged approximately \$600 in proceeds from each counterfeit check that he personally passed.
- d. **McCrumby** also occasionally employed "runners" to pass the counterfeit checks that he had created using stolen bank account numbers. **McCrumby** would share the proceeds from the successfully-passed counterfeit checks

with the runners.

- e. **McCrumby** and his runners often purchased merchandise and gift cards from Target and Walmart. They then sold the merchandise and gift cards to buyers for a fraction of their retail value.
- f. The merchants, such as Target and Walmart, who negotiated the counterfeit checks operated in interstate commerce, and the transactions affected interstate commerce.

3. Overt Acts in Furtherance of the Scheme and Artifice to Defraud

- a. Between approximately January 1, 2008, and May 1, 2009, **Crawford** sold dozens of bank account numbers to **McCrumby**.
- b. On or about April 7, 2009, **Crawford** met **McCrumby** at his office and offered to sell him a list of bank account numbers. **McCrumby** paid \$300 for the list of account numbers that he believed were stolen, and told **Crawford** that he would pay her \$1,000 for every 30 stolen bank account numbers she brought him in the future.

Count One
Conspiracy to Commit Bank Fraud
(Violation of 18 U.S.C. §1349)

The Grand Jury realleges the allegations set forth in the Introduction of this indictment.

Between approximately January 1, 2008, and May 1, 2009, in the Northern District of Texas and elsewhere, the defendants, **Isaac McCrumby** and **Kimberly Crawford**, unlawfully and willfully did combine, conspire, and agree with one another, and others known and unknown to the Grand Jury, to commit offenses under 18 U.S.C. §1344, that is: to knowingly execute and attempt to execute the above-described scheme and artifice to defraud Countrywide Bank and to obtain moneys, funds, and credits under the custody and control of Countrywide Bank by means of materially false and fraudulent pretenses, representations, and promises. In furtherance of the conspiracy, **McCrumby**, **Crawford**, and their unindicted coconspirators committed the overt acts described in the Introduction.

All done in violation of 18 U.S.C. §1349.

Count Two
Felon in Possession of a Firearm in Commerce
(Violation of 18 U.S.C. § 922(g)(1))


On or about April 8, 2009, in the Fort Worth Division of the Northern District of Texas, the defendant, **Isaac McCrumby**, being a person who had been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, that is, a felony offense, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, to wit, an AK-47 assault rifle, serial number AC0067148.

In violation of 18 U.S.C. § 922(g)(1).

A TRUE BILL.


FOREMAN

JAMES T. JACKS
ACTING UNITED STATES ATTORNEY


JAY STEVENSON WEIMER
Assistant United States Attorney
SBOT #24013727
Burnett Plaza, Suite 1700
801 Cherry Street, Unit 4
Fort Worth, Texas 76102-6882
Telephone: 817-252-5200
Facsimile: 817-978-3094

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

VS.

ISAAC McCRUMBY (1)
KIMBERLY CRAWFORD (2)

INDICTMENT

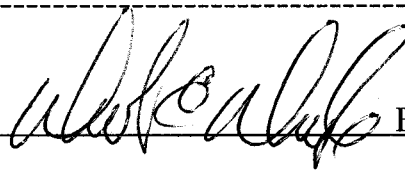
18 U.S.C. § 1349
Conspiracy to Commit Bank Fraud

18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm in Commerce

(2 COUNTS)

A true bill,

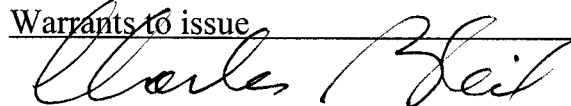
FORT WORTH



FOREPERSON

Filed in open court this 13th day of May, A.D. 2009.

Warrants to issue



UNITED STATES MAGISTRATE JUDGE

ORIGINAL

CRJRM

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS**

1. Defendant Information

Juvenile: ☐ Yes ☒ No

Sealed: ☐ Yes ☒ No

Defendant Name

ISAAC MCCRUMBY (1)

Alias Name

Address

2. U.S. Attorney Information

AUSA Jay Stevenson Weimer

Bar # 24013727

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

4. Location Status

☒ Warrant to Issue

☐ Federal Inmate

☐ Already in State Custody

☐ On Pretrial Release

5. U.S.C. Citations

Total # of Counts as to This Defendant: 2 ☐ Petty ☐ Misdemeanor ☒ Felony

<u>Citation</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
18 U.S.C. § 1349	Conspiracy to Commit Bank Fraud	1
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm in Commerce	2

Related Case Information

Superseding Indictment: ☐ Yes ☒ No

New Defendant: ☒ Yes ☐ No

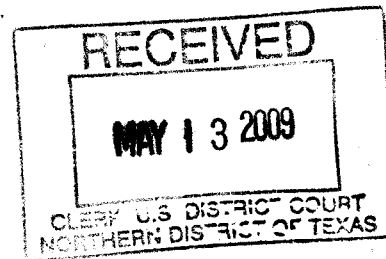
Pending CR Case in NDTX: ☐ Yes ☒ No

Search Warrant Case Number: _____

Rule 20 from District of: _____

Magistrate Case Number: _____

4-09CR-060-A



Date 5/12/09

Signature of AUSA: [Signature]

ORIGINAL

TURN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

Related Case Information	
Superseding Indictment:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
New Defendant:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Pending CR Case in NDTX:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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1. Defendant Information

Juvenile: ☐ Yes ☒ No

Sealed: ☐ Yes ☒ No

Defendant Name

KIMBERLY CRAWFORD (2)

Alias Name

Address

2. U.S. Attorney Information

AUSA Jay Stevenson Weimer

Bar # 24013727

3. Interpreter

☐ Yes ☒ No

If Yes, list language and/or dialect: _____

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Citation

Description of Offense Charged

Count(s)

18 U.S.C. § 1349

Conspiracy to Commit Bank Fraud

1

Date 5-12-09

Signature of AUSA: [Signature]